



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
1 CONGRESS STREET, SUITE 1100 - HBR
BOSTON, MA 02114-2023

DATE: October 14, 2004

SUBJ: Site Investigation Closure Memorandum
Lonsdale Bleachery Site
Carrington Street
Lincoln, Rhode Island 02865

FROM: Frank Gardner, On-Scene Coordinator
Emergency Response and Removal Section II, EPRB, OSRR

THRU: Steven Novick, Chief
Emergency Response and Removal Section II, EPRB, OSRR

TO: Lonsdale Bleachery Site File

A handwritten signature in black ink, likely belonging to Frank Gardner, is located to the right of the "FROM:" field.

In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Lonsdale Bleachery Site ("Site") in Lincoln, Rhode Island. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release
 - a. The Removal Site Evaluation consisted of the following actions.
 - i. Review of analytical results generated by EPA and its contractors from sampling conducted on September 22, 2004.
 - ii. Coordination with the Rhode Island Department of Environmental Management (DEM) with regards to an ongoing release of oil from the Site into the Blackstone River.
 - iii. Generating a PA/SI report by EPA's contractor, titled "Removal Program Preliminary Assessment/Site Investigation Report for the Dubois Property, Turners Falls, Massachusetts", by Weston Solutions, Inc., Region 1 Superfund Technical Assessment and Response Team".

- b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants that are being released or for which there is threat of release include but are not necessarily limited to the list below.

Hazardous Substances or
Pollutants or Contaminants

Media

asbestos

pipe insulation

heating oil

surface water

2. Evaluation of the threat to public health, welfare and the environment

- a. Federal Agency for Toxic Substances and Disease Registry:

Threat _____ No Threat _____ Evaluation Not Necessary X

- b. Endangerment to the ecosystem:

Threat _____ No Threat _____ Evaluation Not Necessary X

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason.

- () There is no release.
- () The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
- () The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.
- () It is subject to the limitations on response specified in §300.400(b)(1) through (3). The release is
 - () of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.
 - () from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.
 - () into public or private drinking water supplies due to deterioration of the system through ordinary use.
- () The amount, quantity, or concentration released does not warrant a Federal response.

- ☐ A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.
 - ☒ The Removal Site Evaluation is complete.
- 4. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.
 - a. The factors listed below, found in Section 300.415(b)(2) of the NCP, are applicable to this Site.
 - ☒ Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.
 - ☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems.
 - ☐ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
 - ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.
 - ☒ Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
 - ☐ Threat of fire or explosion.
 - ☐ The availability of other appropriate Federal or State response mechanisms to respond to the release.
 - ☐ Other situations or factors that may pose threats to public health or welfare of the United States or the environment.
 - b. The existence of the conditions specified in Section 4.a., above, indicate that a Removal Action under section 300.415 of the NCP is necessary. EPA sampling documented the presence of asbestos in pipe insulation in the former boiler area on a portion of the Site (Lot 60). Access to the area is unrestricted. The asbestos appears to be in the process of falling off of the piping and may pose a direct contact threat to those who may access the area.
 - c. In light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action at this Site is:

Emergency____ Time-Critical X Non Time-Critical____
- 5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.
 - a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has

occurred.

- (X) There is a release, or potential threat of release, as governed by the CWA as amended by OPA.
- () There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.

- b. The existence of the conditions specified in Section 5.a., above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP is necessary. An ongoing release of heating oil is occurring from a portion of the Site (Lot 96) into the Blackstone River. EPA has been coordinating with DEM since July 29, 2004 to respond to this release. DEM is currently maintaining boom and sorbent materials to prevent the oil from migrating down river. EPA created a federal project number under the Oil Spill Liability Trust Fund, and EPA and DEM will continue to work in a coordinated fashion to isolate and eliminate the source of this oil release.

cc: Steven Novick, Chief, Emergency Response and Removal Section II, OSRR
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